

**UNITED STATE DISTRICT COURT
FOR THE SOUTHERN
DISTRICT OF TEXAS**

United States Courts Southern
District of Texas

FILED

4/19/21

Nathan Ochsner, Clerk of Court

**IN THE COURT DISTRICT COURT FOR THE
SOUTHERN DISTRICT OF TEXAS**

DISH NETWORK L.L.C.,

Plaintiff,

vs.

**DINESH VUGNESWARAN et al., d/b/a/
Chitram TV**

Defendant

Civil Action No: 4:21-cv-859

**STATEMENT OF
SINJU THOMAS**

I, Sinju Thomas, hereby attest that the following statements are true under penalty of perjury.

1. I make the following statements based upon my own personal knowledge and in support of "Defendants' filed civil action no: 4:21-CV-859 concurrently herewith.
2. All the allegations leveled in your letter have been done as matter of making allegation and without any valid documentary evidence. Even if there is documentary evidence they have not been provided and this reply is being given without my self-having advantage of going through the documents and replying to the same.
3. Without prejudice to what is stated above I wish to give the present reply with the sole intention of clarifying the doubts and allegations leveled against me, and also would want to show that I am a law abiding citizen and has the highest respect for Law. I had been following all the rules, regulations and guidelines and I would wish to state that there is no illegality committed by me as alleged in your letter.
4. I am not selling Chitram TV set-top box receivers and streaming services. The fact of the matter is that I met a person named Kannan an Indian origin Tamil at Mercy health system at 520-S mustang road, Yukon, Oklahoma, when I took my sick daughter to the pediatrician, Feb 2018.
5. Kannan, I met at above mention location where he inquires about my daughter's sickness. I precisely tell him about her health condition that was pretty bad due to insufficient daily intake of vitamins and minerals. He suggested few Indian Ayurveda tips to boost her metabolism and mentioned the TV

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1 service provider and mentioned the said TV channel, furthermore, he affirmed that you can watch
2 Indian health TV channels which specifically explain the benefits of the Ayurveda medical system. I
3 anyhow hooked into his way of explaining that we all know Western medicine is symptomatic
4 treatment and the resources one has given are to treat the symptoms. Ayurveda treats the root cause of
5 the problem. At that moment I requested, where I can purchase a said TV box. He recommended me
6 the said website.

- 7
- 8 6. A few weeks later I proceed to the said website, from there I had noted down the sales contact number
9 +1 5853266085. I contacted them and have requested said product. For booking my order they had
10 asked about necessary details, as I have provided. I was told by the sales booking personal that the
11 regional sales manager will contact you at your provided number. After few days, I received a phone
12 call from a regional sales manager named Asis Patel. He told me about product delivery at the given
13 address. I was expecting delivery of product through courier service but get surprised when he visited
14 personal and delivered the box.
- 15
- 16 7. I start using their services and find out very handy. My friends, neighbors, and family members visited
17 my place quite often. They have started asking me about the said product; such as where to get it and
18 so on. I recommend them the said website address, but few of my family members and friends finding
19 difficult to get the said product. This is where I helped them by getting said product through Asis Patel
20 at my address and further deliver to them.
- 21
- 22 8. Furthermore, I received an offer from Asis Patal that if I promote their product there will be a
23 monetary benefit I may get, \$10 per sale. I point blankly refused to take any sort of offer from Asis
24 Patel and told him that I only help to get these boxes to my friends and family because services are
25 quite convenient to them. On a certain occasion, I received a couple of random calling and asking for
26 boxes. First, I thought it was someone through my family member and helped those getting boxes and
27 then realized something is fishy where the call volume started to increase.
- 28
- 29 9. Later I asked one of them how did you get my contact details; he replied by saying that your contact
30 information is available at the said product website. I called their support line and said about my
31 grievances to them and in reply they have stated that we shared your personal information on the
32 website, that's the reason why unknown persons calling at your number and inquiring about the
33 product. It is pertinent to mention here that I categorically order them to take down my personal
34 information from their website and else I will initiate legal action against them.

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1 10. As the above mention facts are clearly stated that I am an end-user of the said product and have no
2 concern with the selling, reselling, selling subscription codes, devices and equipment for the said
3 product, hence your allegation are absolutely baseless.

4
5 11. About the above mentioned facts, it is hereby stated that I am just an end-user of the said product
6 and have no concern with the selling, reselling, selling subscription codes, devices and equipment
7 for the said product, hence your allegation are absolutely baseless.

8
9 It is humbly prayed to the honorable court that please removes my name from all types of
10 investigation and further litigations.

11
12
13 I HEREBY DECLARE THAT THE ABOVE STATEMENT IS TRUE TO THE BEST OF MY
14 KNOWLEDGE AND BELIEF, AND USE AS EVIDENCE IN COURT AND IN SUBJECT TO
15 PENALTY FOR PERJURY.

16
17
18
19 Dated on the 19th of April, year 2021
20

21 

22 **Sinju Thomas**